

The Whale Video Co.



Video Productions of Whales for Home, Education and Promotions
Stock Film Library Services

May 16, 2001

Donna Wieting
Chief Marine Mammal Conservation Division
Office of Protected Resources
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910-3226

Dear Ms. Wieting:

My comments are based on thirteen years of filming whales and dolphins on Stellwagen Bank.

The LFA proposal needs to address two issues in more detail.

Small take permit

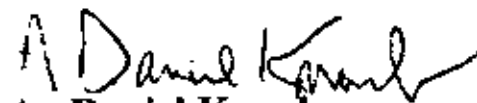
I have seen whale distributions change drastically in short time frames. Within just one hour I have seen one large whale (finback and humpback) in an area and then up to ten or twenty. Dolphins are so fast and far ranging that hundreds if not more than 1000 can move quickly into an area. What applies to a small take permit may change drastically in a short time frame.

Noise level considered harassment

Large whales such as the humpback show a great interest in sound. A person merely hitting the side of a boat with their hand can get a humpback to move. Also, I have documented cases where fast moving boats, usually rented by tourists pass close to whales, completely changing their behaviors. Especially with mother/calf pairs, they can go from logging (resting) to continuous breaching, in a direction away from the boat.

I am against LFA if there is any possible harm to marine mammals.

Sincerely,



A. Daniel Knaub
USNA Class of '74